EXHIBIT 15

DURIE TANGRI LLP
DARALYN J. DURIE (*Pro Hac Vice*)
ddurie@durietangri.com
JOSEPH C. GRATZ (*Pro Hac Vice*)
jgratz@durietangri.com
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: 415-362-6666
Facsimile: 415-236-6300

Attorneys for Defendant
Google Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

The Authors Guild, Inc. et al., Plaintiffs, v. Google Inc., Defendant.	Civil Action No. 05 CV 8136 (DC)

DEFENDANT GOOGLE INC.'S SUPPLEMENTAL NARRATIVE RESPONSES AND OBJECTIONS TO PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

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PUBLIC REDACTED VERSION

Pursuant to Federal Rules of Civil Procedure 26 and 34 and pursuant to the parties'

agreement, Defendant Google, Inc. ("Google") provides this supplemental set of responses and

objections to the Second Set of Document Requests (the "Requests") propounded by Plaintiff

The Authors Guild, Inc. ("The Authors Guild") as follows:

GENERAL OBJECTIONS

1.   Google objects to the preface, instructions, and definitions to the Requests to the

extent that they purport to impose obligations that exceed those imposed by the Federal Rules of

Civil Procedure, relevant local rules, and applicable case law. In responding to these requests,

Google has followed the applicable law and has ignored the improper preface, instructions, and

definitions.

2.   Google objects to the Requests in their entirety and to each request to the extent

that the documents and information sought are protected from discovery by the attorney-client

privilege, the work-product doctrine, or any other applicable privilege.

3.   Google objects to each and every request to the extent that it seeks information

that is confidential and/or proprietary information. To the extent not otherwise subject to

objection, Google will produce such confidential documents in accordance with the terms of the

protective order entered in this case.

4.   Google objects to the Requests in their entirety and to each discovery request to

the extent that it requests "all documents" and "all copies," or other similar language, consisting

of materials that are produced in multiple copies. Google will produce representative examples

of such documents and things to the extent that they are relevant, discoverable, and not subject to

any claim of privilege.

5.   Google objects to the Requests in their entirety and to each discovery request as unduly burdensome to the extent they seek information or documents already known to Plaintiffs, or which are equally available to Plaintiffs.

6.   Google objects to the Requests in their entirety and to each discovery request to the extent they seek documents not relevant to any claim or defense in this action or reasonably calculated to lead to the discovery of admissible evidence.

7.   Google objects to The Authors Guild's definition of "Google" as vague, ambiguous, unintelligible, and overly-broad. For purposes of responding to these discovery requests, Google will interpret "Google" to mean Google, Inc. and/or its agents.

8.   Google objects to the Requests in their entirety and to each discovery request to the extent they purport to require the identification and description of every document no longer in existence

9.   Google objects to the Requests in their entirety and to each discovery request to the extent they seek to require the identification of the department, branch, or office in whose possession the document was located and the natural person in whose possession the document was found.

10.   Google objects to the time period of these requests as overly broad and unduly burdensome.

11.   Google objects to the Requests to the extent they request information pertaining to persons or activities outside the United States.

12.   Google objects to each and every discovery request to the extent that it purports to impose a burden of providing information not in Google's possession, custody, or control or which cannot be found in the course of a reasonable search. Google has undertaken a reasonable

and good-faith effort to locate all relevant, non-privileged documents known to it at this time that are responsive to these requests, but they reserve the right to conduct further investigation and discovery as to any issue raised or suggested by any discovery request and to rely on any subsequently discovered information or documents at trial or any other proceeding.

13.   Google has not yet completed its investigation of the facts relating to this case. Any and all responses to the following discovery requests are therefore based solely on information presently known to Google, and Google reserves its right to conduct further discovery and investigation and to use at trial or any other proceeding evidence of any subsequently discovered facts, documents, or information.

14.   In responding to these discovery requests, Google does not concede the relevancy or materiality of any request or of the subject to which any request refers. Google's responses to these discovery requests are made expressly subject to and without waiving any objections in any proceeding, including trial of this action, as to competency, relevancy, materiality, or privilege of any of the documents referred to or the responses given.

SUPPLEMENTAL NARRATIVE RESPONSES TO REQUESTS FOR PRODUCTION

Subject to the general objections stated above, and subject to the specific objections to each Request, served November 21, 2011, Google provides the following supplemental narrative responses in lieu of document productions, pursuant to the agreement of the parties.

I.   INCLUSION CRITERIA

This narrative is responsive to Request No. 10 in Plaintiffs' Second Set of Requests for Production of Documents to Google, which calls for: "Documents sufficient to identify all criteria used by Google to select which works to copy in the Library Project." This narrative describes Google's policies and practices since approximately May, 2008 with respect to books (as opposed to periodicals or other materials) from libraries. This narrative is provided in

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fulfillment of the Request, pursuant to the parties' agreement, and is provided subject to Google's November 21, 2011 objections to the Request and subject to Google's general objections, and may be amended or supplemented as Google's investigation of the facts continues.

Google selects which books from libraries to scan in the following manner. ▮

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II.   SCANNING AND INDEXING PROCESS

This narrative is responsive to a portion of Request No. 1 (which calls for "the number of copies made of each book") and a portion of Request No. 9 ("Documents sufficient to describe all uses made by Google of all copies of all in-copyright, English language books copied in the Library Project."). This narrative is provided in fulfillment of the Request, pursuant to the parties' agreement, and is provided subject to Google's November 21, 2011 objections to the Request and subject to Google's general objections, and may be amended or supplemented as Google's investigation of the facts continues. This portion of the narrative describes the process by which Google scans and indexes books from libraries for snippet display in the United States.

A.   Scanning

After Google has received a book from a library for scanning, and that book has been checked in, it is given to a scan station operator. ████████████████████████████████ ██ The scan station operator then scans the covers and scans each page of the book without removing the pages from the binding; this is known as "non-destructive" scanning. The scan station takes pictures of the covers and of each page of the book with two cameras. The first camera takes a standard photograph of the page. The second camera takes an infrared image of the page, which is used to "de-warp" the page during later processing, based on an infrared grid which is projected onto the page during scanning. ██

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B.   Processing

After scanning, automated image processing is performed on the scanned images. ████

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████████████████████ Optical character recognition ("OCR") is performed on the images

to derive machine-readable text, and that text is stored on an internal file server.

C.   Analysis

Next, an automated process compiles a digital copy of the book. ████████████

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Based on the book's metadata, this process then determines the viewability of the book --

"Metadata only view," "snippet view," "partial preview," "full view," and so on. Pre-1923

books are placed in full view. Books published in 1923 or later and books for which no date can

be ascertained are placed in snippet view, except:

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- reference works are placed in metadata only view;

- books published within the preceding two years which would have been placed in snippet view are placed in metadata only view;

- works for which a rightsholder has instructed Google not to display the work are placed in metadata only view and, in addition, the text is not made searchable;

- partner program books are given the viewability chosen by the partner program participant; and

- books for which research has revealed public domain status despite publication in 1923 or later are placed in full view.

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D.   Indexing

After Analysis, the book is indexed so that it may be searched. ████████████████

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In addition, if the library whose copy of the book was scanned submits a request for a digital copy of the book through the Google Return INterface (GRIN), a temporary, encrypted copy of the page images and corresponding text and metadata for that book is placed on a server to which that library has access. ████████████████████████████

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In addition, throughout the process, backup and replication copies are made of the data identified above as necessary to ensure reliability and speed of access to that data.

In addition, some books are re-scanned to ensure quality.

The books are then made searchable through the Google Book Search website, and are viewable based on the appropriate viewability status. ████████████████████████

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III.   USES MADE OF BOOKS

This narrative is responsive to a portion of Request No. 9 ("Documents sufficient to describe all uses made by Google of all copies of all in-copyright, English language books copied in the Library Project."). This narrative is provided in fulfillment of the Request, pursuant to the parties' agreement, and is provided subject to Google's November 21, 2011 objections to the Request and subject to Google's general objections, and may be amended or supplemented as Google's investigation of the facts continues. This narrative describes non-display uses made by Google of English-language books.

Google makes the following non-display uses of books:

- Text and images from books are used to facilitate the provision of the functionality of the Google Book Search web site, including optical character recognition to derive the text of the books from images and clustering analysis to identify different editions or different copies of the same book.

- Text from books is used as an input to the "n-grams" research project, which is described in Michel et al., *Quantitative Analysis of Culture Using Millions of Digitized Books*, 331 SCIENCE 176 (2011), *available at* http://www.sciencemag.org/content/early/2010/12/15/science.1199644 , and the results of which are available at http://books.google.com/ngrams .

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IV. SECURITY

This narrative is responsive to Request No. 13 ("Documents sufficient to describe in detail the security procedures employed by Google to prevent unauthorized access to and display of books copied in the Library Project."). This narrative is provided in fulfillment of the Request, pursuant to the parties' agreement, and is provided subject to Google's November 21, 2011 objections to the Request and subject to Google's general objections, and may be amended or supplemented as Google's investigation of the facts continues. This narrative describes procedures employed with respect to the security of images of snippet view books.

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With respect to the security of the front-end system which provides scan data to libraries (the Google Return Interface, or GRIN), that system is secured, for example, in the following manner. ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮

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Google also ensures that searches that return snippets of books cannot be used to recover entire books or entire pages of books, as follows:

- To prevent users from being able to formulate a query which will predictably return the "next" snippet on a page, the positions of snippets on a page are fixed, with pages divided into about eight snippets. The actual number of snippets depends on the height-to-width ratio of the page, ████████████████████ ███ ████████████████████████████████. Thus, while a normal book has about eight snippets per page, a book with extremely tall pages would have more than eight snippets per page, and a book with extremely wide pages would have fewer than eight snippets per page.

- Also to prevent users from being able to formulate a query which will predictably return the "next" snippet on a page, █████████████████████████ ███ ██████████████████████████████████ ████████████████████████

- To prevent the entire book from being downloaded and pieced together, Google blacklists at least one out of every ten pages in each book.

- To prevent any entire page from being downloaded and pieced together, Google blacklists one of the snippets on every page (unless there are three or fewer

snippets per page, which could only occur if a book had pages for which the page height is less than two thirds of the page width)

- To deter automated "scraping" of snippets, ███████████████████████
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- To deter automated "scraping" of snippets, Google places rate limits on the snippet display of any given book, aggregated over all users. ████████████
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- To further deter automated "scraping" of snippets, Google places rate limits on the snippet display to any given user ████████████████████, aggregated over all books. ███████████████████████████████████████

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Google is not aware of any intrusion attempt which has allowed unauthorized access to back-end scan data or to blacklisted snippets. Google is not aware of any effort to "scrape" snippets on a substantial scale.

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Dated: December 9, 2011   As to objections:

                                        By: /s/ Joseph C. Gratz

Daralyn J. Durie (*pro hac vice*)
ddurie@durietangri.com
Joseph C. Gratz (*pro hac vice*)
jgratz@durietangri.com
DURIE TANGRI LLP
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: 415-362-6666
Facsimile: 415-236-6300

Attorneys for Defendant Google Inc.

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed

in San Francisco County, State of California, in the office of a member of the State Bar of

California, at whose direction the service was made. I am over the age of eighteen years, and not

a party to the within action. My business address is 217 Leidesdorff Street, San Francisco, CA

94111.

On December 9, 2011, I served the following document(s) in the manner described

below:

**DEFENDANT GOOGLE INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS AND THINGS**

☐   (BY U.S. MAIL) I am personally and readily familiar with the business practice
of Durie Tangri LLP for collection and processing of correspondence for mailing
with the United States Postal Service, and I caused such envelope(s) with postage
thereon fully prepaid to be placed in the United States Postal Service at San
Francisco, California.

☐   (BY MESSENGER SERVICE) by consigning the document(s) to an authorized
courier and/or process server for hand delivery on this date.

☐   (BY FACSIMILE) I am personally and readily familiar with the business practice
of Durie Tangri LLP for collection and processing of document(s) to be
transmitted by facsimile and I caused such document(s) on this date to be
transmitted by facsimile to the offices of addressee(s) at the numbers listed below.

☐   (BY OVERNIGHT MAIL) I am personally and readily familiar with the business
practice of Durie Tangri LLP for collection and processing of correspondence for
overnight delivery, and I caused such document(s) described herein to be
deposited for delivery to a facility regularly maintained by Federal Express for
overnight delivery.

☒   BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy
through Durie Tangri's electronic mail system from jgratz@durietangri.com to
the email addresses set forth below.

☐   (BY PERSONAL DELIVERY) I caused such envelope to be delivered by hand to
the offices of each addressee below.

On the following part(ies) in this action:

        Michael J. Boni
        Joanne E. Zack
        BONI & ZACK LLC
        15 St. Asaphs Road
        Bala Cynwyd, PA 19004
        Telephone: 610-822-0200
        Fax: 610-822-0206
        Email: mboni@bonizack.com
             jzack@bonizack.com

        Attorneys for Plaintiffs

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on November 21, 2011, in San Francisco, California.

                              /s/ Joseph C. Gratz
                                  Joseph C. Gratz